



MURIEL GOODE-TRUFANT  
Acting Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**

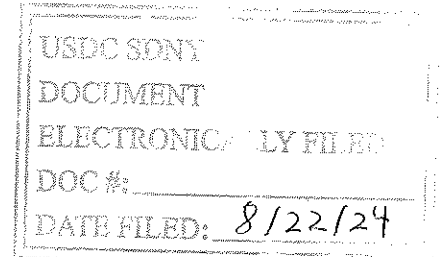
100 CHURCH STREET  
NEW YORK, NY 10007

Marina Moraru  
Special Assistant Corporation Counsel  
Office: (212) 356-2456

August 21, 2024

**VIA ECF**

Hon. Colleen McMahon  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007



Re: *A.H. et al., v. N.Y.C. Dep't of Educ.*, 24-5918 (CM)(OTW)

Dear Judge McMahon:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request that the Initial Pretrial Conference (IPTC) currently scheduled for October 24, 2024 be cancelled. Your Honor's August 13, 2024 Order (ECF 9) specified that if a proposed Case Management Plan (CMP) is submitted at least two business days prior to the scheduled IPTC and approved by the Court, the IPTC will be cancelled automatically. Pursuant to section IV (J) of Your Honor's Individual Rules, the parties instead jointly submit the proposed briefing schedule below, in the event this matter is not resolved through settlement:

- Plaintiff's motion for summary judgment will be due on January 27, 2025.
- Defendant's opposition will be due on February 27, 2025.
- Plaintiff's reply, if any, will be due on March 14, 2025.

Thank you for considering this request.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.

Special Assistant Corporation Counsel

cc: Adam Dayan, Esq. (via ECF)

Schedule approved. Conference cancelled.

*Colleen McMahon*  
8/22/24